

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE JUUL LABS, INC., MARKETING,  
SALES PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**STATUS REPORT ON SETTLEMENT  
IMPLEMENTATION**

This Document Relates to:

ALL ACTIONS

Plaintiffs hereby provide an update on the government entity settlements, in accordance with the Court's request.

As previously indicated, the government entity settlements will provide significant funding to more than 1,500 government entities in 46 different states across the United States. The agreements with both JLI and Altria require the settlement funds to be used for "compensatory restitution or remediation," terms specifically chosen to outline the purpose and parameters of the settlement. The settlements are enabling government entities throughout the country to adopt tailored, community-focused approaches to youth vaping and addiction prevention, education, and cessation treatments. Below are examples of how the government entity settlement is funding solutions to the public health youth e-cigarette crisis.

**A. Bellwether Government Entity Plaintiffs**

**1. San Francisco Unified School District, California**

Bellwether Plaintiff San Francisco Unified School District ("SFUSD") developed a plan for settlement proceeds that will support student health for years to come. Pursuant to that plan, the settlement funds are being used to address student tobacco/vaping education and related student

1 health issues, which may include student mental, emotional, and social health. This includes  
2 working with community partners to provide on campus resources and access to community  
3 programs, implementing classroom-based education enabling students to make health choices,  
4 continuing health education at 13 middle schools, and funding wellness staff at 16 high schools.  
5 For the current school year, SFUSD has used settlement proceeds to fund a total of 74 positions at  
6 middle and high schools. The proceeds have, thus far, been primarily used to fund nurses,  
7 counselors, and community health outreach workers at high school and middle school wellness  
8 centers. In addition, settlement proceeds have been used to fund three central office positions  
9 supporting student health, two in the Office of Equity and one in the Student & Family Services  
10 Division.

## 11 **2. King County, Washington**

12 Bellwether King County, Washington (“King County”), is dedicating settlement resources  
13 to addressing harms related to the vaping epidemic. King County’s Public Health – Seattle & King  
14 County Cannabis, Tobacco, and Vapor Prevention Program (“CTV”) is working on using the  
15 funding over ten or more years to make significant and sustainable changes in the landscape of  
16 nicotine and vapor product use.

17 To support these goals, King County is adopting a comprehensive approach to combating  
18 youth nicotine use. Using the settlement funds, King County will incorporate all elements of  
19 effective comprehensive commercial tobacco control programs, including community-based work,  
20 policy and advocacy efforts, cessation access, evaluation and monitoring, and communication and  
21 education.

22 In 2024 and 2025, King County’s CTV is scaling up in-demand and under-resourced  
23 tobacco control programs, including providing Community Change Prevention Grants to fund  
24 youth and community designed initiatives. CTV Community Change Prevention Grants provide  
25 funding and technical assistance to community organizations to address risk and protective factors  
26 affecting nicotine and cannabis use and cessation. CTV also provides technical assistance to support  
27 grantees. These grants elevate youth leadership and community expertise. As a result, King County  
28 has been able to reach new partners, such as organizations who serve East African and refugee

1 communities. Before the settlement, King County was able to fund less than half of the applicants  
2 including many that the review team scored highly. The settlement monies have already allowed  
3 CTV to hire and onboard two additional grant managers and will allow many more youth and  
4 community designed initiatives to be implemented in the region.

5 To identify and enhance additional strategies, King County is conducting robust assessment  
6 and community engagement in 2024 and 2025. As part of this work, settlement funds will  
7 support robust surveillance assessment of youth nicotine use and enable dedication of resources to  
8 invest to address the needs and leverage the resources that assessment work identifies. King County  
9 has been making progress on multiple workstreams.

#### 10 **Assessment infrastructure**

11 Since receiving the first installments of settlement funds, King County identified  
12 epidemiological and social research scientist support for the assessment, hired an assessment  
13 project manager, and developed an agreement from the Washington State Cancer Prevention  
14 Research fund to match up to \$500,000 in funds to expand assessment work and reserve settlement  
15 funds for implementation. King County is currently recruiting and convening its community  
16 advisory board and selecting consultants for listening session logistics and community forums.

#### 17 **Analysis of existing data**

18 King County has established analysis plans for the Young Adult Health Survey and the  
19 Healthy Youth Survey. It has also secured a contract for analysis of data from the Young Adult  
20 Health Survey. It continues to develop analysis plans for the Behavioral Risk Factor Surveillance  
21 System and Quitline data.

#### 22 **Community listening and data collection**

23 The County has also completed a guide and plan for youth listening sessions and is working  
24 on scheduling and conducting youth listening sessions next year. It will then analyze these sessions,  
25 present the findings to the community advisory board, and develop and select prevention strategies  
26 that will begin to change the landscape of nicotine and vapor product use.

### 27 **3. Tucson Unified School District, Arizona**

28 Shortly after the settlement, Bellwether Plaintiff Tucson Unified School District (“TUSD”)

formed an Addiction Reduction Task Force, led by School Board President and community family physician Dr. Ravi Shah, made up of experts in the community on addiction medicine, harm reduction, and prevention strategies, along with district leadership. The Addiction Reduction Task Force will present to the TUSD Board evidence-based recommendations and best practices to support students with and at risk for addiction and related health issues and make recommendations on best uses of the settlement proceeds. Thus far, TUSD has hired a Program Manager, Program Coordinator, and five Community Health Workers to be placed at sites regionally. TUSD is currently developing a referral process for engaging the regional Community Health Workers and is onboarding staff. TUSD has identified the training plan for Community Health Worker employees, which will be in coordination with Pima Community College. TUSD plans to engage a task force to evaluate relevant curriculum in Spring 2025. In addition, TUSD has worked to connect substance abuse and addiction programs with student support programs, such as Social Emotional Learning and Multi-Tiered Support Systems as well as providing outreach and awareness on these issues to community stakeholders. TUSD staff have also worked with substance abuse prevention agencies in the community (prevention and intervention based) to provide services to students and families that are at high-risk for substance misuse.

#### **4. City of Rochester, New Hampshire**

Bellwether Plaintiff City of Rochester, New Hampshire (“Rochester”), which served as both a municipal and a school bellwether, is using and/or ear-marked the funds for three purposes thus far. First, Rochester has increased security cameras on school property in areas historically used by youth to vape. Second, Rochester installed specific vaping detectors in school bathrooms: similar to smoke detectors, but they alert school staff to vaping products being used. Third, Rochester is using the funds to create (and fund for many years) a Family and Community Engagement (FACE) director that will directly interact with youth on various aspects of their emotional well-being, including combatting vaping.

Rochester’s new FACE director will directly accomplish the goals of the settlement. Terence O’Rourke, the Rochester City Attorney, prepared the below bullet points to summarize the import of the FACE program and how it will positively impact Rochester’s youth:

- 1 • FACE strengthens the district’s foundation and ensures the success of every student. The  
2 partnership between schools, families, and the broader community has become increasingly  
3 critical over the years. The success of Rochester’s students hinges not only on what happens  
4 within the walls of our schools but also on the support, resources, and collaboration that  
5 extend beyond them.
- 6 • In an era where students are increasingly confronted with challenges such as vaping, illegal  
7 drugs, violence, and aggression due to challenges to self-manage and regulate, it is essential  
8 that they receive consistent messages about making responsible choices. FACE plays a  
9 crucial role in developing and implementing prevention programs that engage both families  
10 and community partners in educating students about the risks and consequences of these  
11 behaviors. By fostering open communication and providing resources, FACE can help  
12 create a unified approach to guiding students toward positive, healthy decision-making.  
13 This proactive engagement will help reduce risky behaviors, contributing to a safer and  
14 more supportive school environment.
- 15 • The mental health and well-being of our students are paramount to their overall success.  
16 FACE coordinates resources and support systems that address students’ social-emotional  
17 needs. It ensures that families are informed, engaged, and equipped to recognize and  
18 respond to mental health challenges. By fostering a collaborative approach, Rochester can  
19 create a more supportive and responsive environment that prioritizes students’ mental health,  
20 leading to better academic performance and overall well-being.
- 21 • Research consistently shows that active family and community involvement is a significant  
22 factor in improving student achievement. FACE serves as a vital link, creating programs  
23 and initiatives that foster meaningful collaboration between families, schools, and  
24 community partners. By involving parents and guardians more deeply in the educational  
25 process, Rochester can create a stronger support system that reinforces learning at home,  
26 addresses barriers to academic success, and fosters a culture of high expectations.

## 27 **5. Palm Beach County Schools, Florida**

28 Bellwether Plaintiff Palm Beach County Schools has already adopted the CDC’s “Whole

1 School, Whole Community, Whole Child” model recommended by Plaintiffs’ abatement expert  
2 Dr. Steven Kelder, developed curricula specific to e-cigarettes, and presented at community events  
3 at libraries and school centers to educate parents and the boarder community about e-cigarettes.  
4 The district has mobilized settlement funds to educate students on the effects of using vapes and  
5 other tobacco products, to provide an education course to students in lieu of suspension for first  
6 and second tobacco offenses, and to provide an education course for teacher and non-instructional  
7 personnel to expand their understanding of vaping, tobacco, and other related products’ effects on  
8 students. In addition, the district is developing a plan for students to develop marketing materials  
9 for educating other students on the effects of vaping. The campaign will include scholarships as  
10 incentives and produced videos will be used district-wide. The district also continues to expand the  
11 use of vaping detectors in schools as a deterrent.

#### 12 **6. Goddard School District, Kansas**

13 Bellwether Plaintiff USD 265 (“Goddard”) has developed trainings for school staff to  
14 recognize e-cigarettes and intervene to stop students from using e-cigarettes, created curriculums  
15 to educate students and parents about the dangers of youth e-cigarette use, and collaborated with  
16 the Kansas State Vaping Task Force. Goddard intends to use the settlement proceeds to address  
17 student vaping. Using the settlement funds, the district plans to expand early childhood programs  
18 for students and families and expand mental health support services for students. Both areas are  
19 related to addressing at-risk behaviors. This approach would be consistent with how the state of  
20 Kansas has used the tobacco settlement fund in creating the Children’s Initiatives Fund that has  
21 focused on early childhood programs and the health and wellness of students. Goddard knows that  
22 if school districts create a more robust early learning program and have support at the upper grade  
23 levels to address the wellness of students, these initiatives help prevent students from engaging in  
24 destructive habits such as vaping and substance abuse generally.

25 Additionally, Goddard is presenting a pilot program for the Board of Education’s  
26 consideration. This program will focus on resources designed to help parents work with the school  
27 and their children when facing various mental and physical health concerns, including vaping and  
28 other health-related issues. Goddard plans to use settlement funds to support this new initiative.

1           **B.     Other Exemplar Government Entity Plaintiffs**

2                   **1.     Wake County Schools, North Carolina**

3           The Wake County Public School System “plans to hire staff and contractors and create  
4 curriculum and programming to keep students from using electronic cigarettes.”<sup>1</sup> Specifically, a  
5 plan was presented to the board to use: “\$2.9 million to hire employees to help with the  
6 programming and supporting students who are struggling with tobacco use problems. The  
7 employees would be funded for only the seven years, and they could be coordinating teachers or  
8 substance-use specialists; \$24,500 for health curricula for third through ninth graders that informs  
9 them of the dangers of vaping and tobacco use. It would pay for ready-made curriculum or  
10 curriculum writers to create new lessons; \$670,000 toward tobacco cessation programming and  
11 treatment for a seven-year period; \$769,000 for tobacco prevention programming; \$95,625 for  
12 training for a few teachers at every school on curriculum on vaping and tobacco use; \$1 million for  
13 community and parent-focused educational events; \$156,875 for a communications plan against  
14 tobacco use; and \$280,000 to fund 10 \$4,000 scholarships every year, for seven years, for students  
15 who advocate against the use of tobacco by their peers.” According to the Wake County Public  
16 Schools Board Chairman, “This is the first time I think we actually have the resources to put  
17 together a program with real, measurable impacts.” *Id.* “Efforts to curb vaping will include all levels  
18 of schools and training for all levels of teachers. . . . [That way,] students can get information about  
19 the dangers of electronic cigarette use before they’re ever offered one.” *Id.* The District is hoping  
20 this will “create a cultural shift in our students.” *Id.*

21                   **2.     Blue Valley School District, Kansas**

22           Blue Valley’s Chief Legal Officer has communicated to plaintiff’s counsel that settlement  
23 funds have supported the District’s annual community event for which the District partnered with  
24 Johnson County Mental Health Center and Johnson County Health and Human Services (913  
25 VAPE FREE) for a community prevention and education presentation. The District also trained  
26 nine Tobacco Treatment Specialists, who created a My Quit Plan Packet for principals to share with

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27           <sup>1</sup> Emily Walkenhorst, *How Wake schools plans to curb vaping among students*, WRAL News  
28 (Feb. 20, 2024), <https://www.wral.com/story/here-s-how-wake-schools-plans-to-curb-vaping-among-students/21292760/>.

1 students and families that have a vaping infraction. As part of this protocol established by the  
 2 Tobacco Treatment Specialists, the District is now using the Stanford Toolkit as a reduction for  
 3 suspension prevention education tool. The District created prevention education posters for schools  
 4 to use with prevention education on their campuses and provide a voucher for a free drug and  
 5 alcohol screening for parents of students who have a vaping infraction. Finally, the District's Drug  
 6 & Alcohol Prevention Task Force (DAPT) will be presenting a prevention education program on  
 7 vaping to the Parent Teacher Organization (PTO) president's council, Advisory Board for Athletics  
 8 & Activities, and Father's clubs.

### 9 **3. Camas School District, Washington**

10 The Camas School District reported it planned to use the JUUL settlement money "to help  
 11 prevent vaping, educate students about the dangers of vaping and to make schools safer."<sup>2</sup> For  
 12 example, "the settlement money will purchase 30 HALO sensors designed to detect vaping and  
 13 fighting inside spaces such as bathrooms where school districts do not want to place cameras or  
 14 microphones." *Id.* "The district had already installed 15 HALO sensors in a few restrooms inside  
 15 Camas middle and high schools. Now, . . . the district can afford to equip all secondary school  
 16 student bathrooms with the sensors that, according to HALO, have been installed 'in over thousands  
 17 of school districts nationwide to help combat the vaping epidemic.'" *Id.*

### 18 **4. Fayette County Schools, Kentucky**

19 Fayette County Schools is using settlement funds to install e-cigarette detectors in  
 20 bathrooms and locker rooms at middle schools in the district to combat the vaping epidemic.<sup>3</sup>

### 21 **5. Framingham Public Schools, Massachusetts**

22 According to Superintendent of Schools Robert Tremblay, the settlement money will be  
 23 used to purchase an "updated K-8 health curriculum targeted at substance use prevention and  
 24

25  
 26 <sup>2</sup> Kelly Moyer, *Settlement will fund vape sensors in Camas schools*, Camas-Washougal Post-  
 27 Record (Oct. 17, 2024), <https://www.camaspstrecord.com/news/2024/oct/17/settlement-will-fund-vape-sensors-in-camas-schools/>.

28 <sup>3</sup> Valarie Honeycutt Spears, *Addressing an 'epidemic.' Fayette will put vaping sensors in some middle schools*, Lexington Herald Leader (June 19, 2024), <https://www.kentucky.com/news/local/education/article289325135.html>.



vaping prevention.”<sup>4</sup> Funds will also support the school district’s “service partnership with Advocates Community Counseling to provide additional individual and group counseling services to students by referral, especially those identified following vaping and substance related conduct referrals.” *Id.*

#### 6. Hattiesburg Public Schools, Mississippi

Hattiesburg Public Schools “plans to use the settlement funds to support initiatives aimed at preventing nicotine use among students and raising awareness about the dangers of vaping.”<sup>5</sup> The District is “committed to ensuring a healthier future for their students, free from the influence of e-cigarettes.” *Id.* “With the settlement, the district also plans to collaborate with local health organizations to create lasting solutions that combat youth nicotine and vaping addiction.” *Id.*

#### 7. Lee County School District, Florida

The Lee County School District is focused on “putting a stop to kids vaping at school.”<sup>6</sup> The District reported it was “somewhat bittersweet because, you know, we have these resources available to us because of those effects, but in seeing some of the effects and what it’s done to students’ attendance and grades, and even the further substance abuse and the effects it has on families, which ultimately affects their student achievement.” *Id.* Specifically, “it is planning to use money from the settlement with the [JUUL] to add vape detectors in restrooms. It also plans to implement educational programs on the effects of substance abuse and provide resources for students battling addiction.” The District is “very excited about some of the opportunities” it now has. *Id.*

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<sup>4</sup> Norman Miller, *Framingham Public Schools will receive \$120,000 as part of vape lawsuit settlement*, The MetroWest Daily News (Aug. 14, 2024), <https://www.metrowestdailynews.com/story/news/local/2024/08/14/framingham-ma-public-schools-receive-120k-juul-labs-class-action-settlement-vaping-dangers/74785712007/>.

<sup>5</sup> Abigail Troth, *Hattiesburg Public Schools secures funds from class action vaping settlement*, WDAM 7 (Sept. 19, 2024) <https://www.wdam.com/2024/09/19/hattiesburg-public-schools-secures-funds-class-action-vaping-settlement/>.

<sup>6</sup> Taylor Wirtz, *Lee County Schools receives over \$2M in Juul Settlement*, WINK (May 8, 2024), <https://winknews.com/2024/05/08/lee-county-schools-over-2-million-juul-settlement/>.

1                   **8.     Lincoln Unified School District, California**

2           Lincoln Unified School District used settlement funds to install e-cigarette detectors in its  
3 schools.<sup>7</sup> “These sensors are a response to the rising epidemic of e-cigarette use among youth,”  
4 LUSD Superintendent Kelly Dextraze said in a statement. “We believe these sensors will help us  
5 to curb a rising concern.” *Id.* If students are caught vaping, there is a progressive disciplinary policy  
6 that is followed, including, for first-time infractions, referral to “a six-week drug and smoking  
7 counseling service offered at the schools.” *Id.* The District also offers substance abuse counseling  
8 at its high schools. The District is also hosting “a vaping informational session” this fall for students  
9 and parents. *Id.*

10                   **9.     Lincoln Public Schools, Nebraska**

11           The Lincoln Public Schools district in Nebraska “is using the money to install vape detectors  
12 in its high schools and, eventually, the middle schools.”<sup>8</sup> As part of a pilot program launched last  
13 year, the district put the devices in restrooms and locker rooms at Lincoln East High School. It  
14 didn’t take long for vaping violations to decrease.” *Id.* “In the first week of activation in October  
15 2023, school officials received nearly 100 vaping alerts. By Christmas break, that number had  
16 dropped to just four. The district has since installed detectors in a second high school.” *Id.* “Students  
17 who trigger an alert are searched, and if a vape device is found, they face suspension and are  
18 required to take a vape-awareness course.” *Id.*

19                   **10.   Loudoun County Public Schools, Virginia**

20           To date, the settlement funds allocated for addressing vaping concerns in Loudoun County  
21 Public Schools (LCPS) have been directed toward several key initiatives aimed at prevention,  
22 intervention, and education. One significant use of funds has been to support five Student  
23 Assistance Specialists who provide dedicated services across schools to help students dealing with  
24

25 \_\_\_\_\_  
26 <sup>7</sup> Greta Reich, *Hoping to curb vaping, California school district uses Juul settlement for sensors*,  
27 SF Gate (Aug. 19, 2024), <https://www.sfgate.com/local/article/vape-sensors-california-high-schools-19661328.php>.

28 <sup>8</sup> Scott Neuman, *Schools are putting vape detectors in bathrooms — paid for by Juul*, NPR (Sept. 12, 2024), <https://www.npr.org/2024/09/12/nx-s1-5090006/vape-detectors-schools-ecigarettes-juul>.

1 substance use issues, including vaping. These specialists play a crucial role in providing counseling,  
2 intervention, and resources to students, supporting their health and well-being.

3 In addition, funds have been utilized to secure a contract with the Cook Center, a resource  
4 known for its expertise in mental health and wellness. The Cook Center offers valuable support  
5 and tools to the School Division, allowing for the development of programs and resources aimed  
6 at reducing vaping and supporting students' overall mental health.

7 Lastly, funds have also supported Parent Guidance, an initiative that provides parents with  
8 resources and information on how to discuss vaping and substance use with their children  
9 effectively. This platform offers parents guidance, strategies, and tools to foster open  
10 communication with their children about the risks of vaping, helping to build a comprehensive  
11 support system involving both school staff and families.

#### 12 **11. Shawnee Mission School District, Kansas**

13 Chief of Student Services, Diversity, Equity and Inclusion for Shawnee Mission School  
14 District in Kansas has advised plaintiffs' counsel that the District has implemented the Vape  
15 Awareness and Wellness Plan it developed to utilize settlement funds, which was referenced in the  
16 previous Status Report on Settlement Implementation. So far, the District has utilized settlement  
17 funds to: present to students and staff on vaping education and awareness; hire a Student Wellness  
18 Specialist; train additional Tobacco Treatment Specialists to reach the goal of providing trained  
19 educators in every secondary school to support students, families, and staff interested in cessation;  
20 and implement student and family engagement activities in schools to educate families about  
21 vaping, as well as tobacco and cannabis use. The District has also utilized settlement funds to build  
22 Alternatives to Suspension Courses for students found with vape/tobacco as first and multiple time  
23 offenders, as well as for those students expressing interest in help to quit. The District is currently  
24 networking with School Sources of Strength Sponsors and Nurses to educate and gain support for  
25 student voice in future awareness campaigns. The District also intends to continue to collaborate  
26 with Physical Education and Health Curriculum cadre members to determine how to increase PreK-  
27 12 education related to student wellness and tobacco.

12. **Unified School District No. 232, Kansas**

The Deputy Chief of Staff and Communication for the Unified School District No. 232 in De Soto, Kansas reported to plaintiff's counsel that the District utilized settlement funds to purchase and install 20 vape detectors, with an expected purchase of 50 additional detectors later this school year that will be installed in its secondary schools. The District recently purchased the rights to utilize resources from Screenagers<sup>9</sup> (over a period of 12 months) to help educate students and parents about vaping, including drugs and alcohol. The District will begin using Screenagers with its high school students. Next, the District will consult with its Teaching & Learning team to identify resources the District can make available to students who may be addicted to nicotine via vaping. Supported by the settlement funds, the District plans to have a multi-year approach in helping educate students and parents to combat youth vaping.

C. **Government Entities Are Also Benefiting From the Growing Body of Research and Resources to Address the Youth E-Cigarette Crisis**

MDL leadership has also organized multiple educational presentations for participating government entities to hear from leading public health organizations and researchers and learn about resources available to combat youth vaping and educate students. Cumulatively, hundreds of representatives from settling government entities have attended these webinars and received expert information and advice about these resources.

These webinars featured presentations from leading public health organizations, including: The Truth Initiative<sup>®</sup>, which began in 1998 with the Tobacco Master Settlement Agreement, (the foundation for the American Legacy Foundation, later renamed Truth Initiative) has developed curricula and research that can be rapidly adopted by the government entity plaintiffs. This organization has available resources for an anti-vaping curriculum including an online course about

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<sup>9</sup> *Screenagers Under The Influence: Addressing Vaping, Drugs, and Alcohol in the Digital Age*, delves into how the tech revolution has reshaped adolescence and its effects on substance use. The film debunks myths and depicts strategies parents and schools can use to encourage healthy decision-making, support teen mental health, set limits, and create healthy home environments. The film also includes many ways young people are using their wisdom and strength to help each other and themselves through this complicated terrain around substance use. The film is grounded in teens' current reality of being flooded by images on social media, movies, and TV shows about vaping, drugs, and alcohol. <https://www.screenagersmovie.com/about-screenagers-under-the-influence>.

the dangers of using e-cigarettes, that was created by Truth Initiative® and Kaiser Permanente and in collaboration with the American Heart Association. This course has been found to significantly increase e-cigarette knowledge among middle and high school participants, according to a study published in *Health Promotion Practice*.<sup>10</sup> Similarly, a recent publication in the British Medical Journal<sup>11</sup> found that “weekly campaign awareness demonstrate that exposure to the truth anti-e-cigarette campaign is associated with significantly lower odds of intentions to use and current use of e-cigarette among YYA [youth and young adults].”;

CATCH My Breath: CATCH My Breath is e-cigarette focused, is developmentally appropriate for elementary, middle, and high school students and has empirical findings of behavior change effectiveness in peer reviewed literature.<sup>12</sup> The program has been recommended by the Substance Abuse and Mental Health Service Administration (SAMHSA<sup>13</sup>) and Community Anti-Drug Coalitions of America (CADCA<sup>14</sup>), two large national organizations devoted to reducing youth and young adult substance use in the U.S. (including tobacco and e-cigarettes).; and

Stanford REACH Lab: Stanford REACH Lab offers evidence-based curriculums and resources to prevent and reduce use of all tobacco/e-cigarette/nicotine products, all cannabis products, and all other drugs. These curriculums have been used by schools across the US and in many countries across the globe, and are developed to map onto national health education

<sup>10</sup> *Vaping curriculum by truth increases student knowledge about e-cigarettes*, Truth Initiative (Aug. 24, 2023), <https://truthinitiative.org/research-resources/tobacco-prevention-efforts/vaping-curriculum-truth-increases-student-knowledge>.

<sup>11</sup> Hair EC, et al., *Reducing e-cigarette use among youth and young adults: evidence of the truth campaign’s impact*, Tobacco Control, British Medical Journal (Aug. 8, 2023), <https://tobaccocontrol.bmj.com/content/early/2023/08/08/tc-2023-057992>.

<sup>12</sup> Kelder, S.H. et al. *Dissemination of CATCH My Breath, a middle school E-Cigarette prevention program*. Addictive Behav., vol. 113 (2021): 106698. <https://pubmed.ncbi.nlm.nih.gov/33130463/>; Kelder, S.H. et al. *A Middle School Program to Prevent E-Cigarette Use: A Pilot Study of “CATCH My Breath”*. Pub. Health Rep., vol. 135,2 (2020): 220-229. [https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7036618/pdf/10.1177\\_0033354919900887.pdf](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7036618/pdf/10.1177_0033354919900887.pdf).

<sup>13</sup> *SAMHSA report lists CATCH My Breath as only school-level youth vaping prevention program*, CATCH Global Found. (May 27, 2021), <https://catch.org/samhsa-recommends-catch-my-breath/>.

<sup>14</sup> *Coalitions in Action—Wolcott Citizens Against Substance Abuse’s “Catch My Breath” Initiative*, CADCA, <https://www.cadca.org/resources/coalitions-action-wolcott-citizens-against-substance-abuses-catch-my-breath-initiative>.

standards. Each interactive lesson includes teacher talking points (e.g., a script), activities, videos, and more. In particular, the Tobacco Prevention Toolkit is a free online and comprehensive resource on tobacco education, parent education and tobacco policies, including educational presentations on e-cigarettes. The toolkit demonstrated impact on knowledge of e-cigarette, perceptions, and intent to try.<sup>15</sup>

Dated: December 1, 2024

Respectfully submitted,

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<sup>15</sup>Gaiha, S.M. et al., *School-based e-cigarette education in Alabama: impact on knowledge of e-cigarettes, perceptions and intent to try*, Nat'l Ctr. For Biotechnology Info (2021), <https://pubmed.ncbi.nlm.nih.gov/32890911/>.

**CERTIFICATE OF SERVICE**

I hereby certify that on December 6, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Dean N. Kawamoto  
Dean N. Kawamoto